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March 10, 2017

Hon. Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Hosseinzadeh v. Klein, et al. (Case No. 16-cv-03801-KBF)

Dear Judge Forrest

We are the attorneys for Defendants Ethan and Hila Klein (collectively, “Defendants”) in the above-referenced matter. This letter-motion is also joined in by counsel for Plaintiff Matt Hosseinzadeh (“Plaintiff”). We jointly write you to **respectfully request the Court to vacate the trial date of April 17, 2017 and all related pretrial deadlines for this matter, and to stay proceedings, pending the Court’s resolution of the Party’s cross-motions for summary judgment** (collectively, “Cross Motions”).

Currently, the following deadlines govern this matter:

- Pretrial Disclosures: March 17, 2017
- Motions *In Limine*: March 29, 2017
- Filing of Pretrial Materials: April 6, 2017
- Final Pretrial Conference: April 12, 2017
- Trial: April 17, 2017

In light of the pending Cross Motions and the imminent deadlines for pretrial filings and disclosures, the Parties believe vacating the current trial date and all related pretrial deadlines for this matter, and staying proceedings, pending the resolution of the Cross Motions is warranted because (1) it facilitates the efficient use of the Parties’ and the Court’s resources, since resolution of the Cross Motions may make such trial preparation unnecessary; and (2) in the event the Cross Motions are denied in whole or in part, the Court’s rulings on the Cross Motions

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will give the Parties guidance narrowing or at least clarifying the issues to be addressed at trial – also resulting in more efficient use of the Parties’ and the Court’s resources.

As such, the Parties respectfully request this Court to vacate the trial date of April 17, 2017 and all related pretrial deadlines, and to stay proceedings, pending the resolution of the Parties’ Cross Motions.

Sincerely,

/s/Rom Bar-Nissim

Rom Bar-Nissim

cc: Tim Bukher (ECF); Michael Feldberg (ECF); Caroline Morgan (ECF); Jeffrey S. Kravitz (ECF)